

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

FOREST RIVER, INC.,

Plaintiff,

-against-

ROBERT REICHENBACH, J.P. BUS & TRUCK
REPAIR LTD. d/b/a BIRD BUS SALES, BIRD BUS
SALES LLC, FACTORY DIRECT BUS SALES,
INC., RICHARD SOLANO, JR., NESCO BUS &
TRUCK SALES, INC., NESCO BUS
MAINTENANCE, INC., NESTOR ZARAGOZA,

Defendants.

**DEMAND FOR
INSURANCE INFORMATION**

**Index No.:
CV-10-1578(DLI)(SMG)**

TO: CO-DEFENDANTS

PLEASE TAKE NOTICE that, pursuant to the Federal Rules of Civil Procedure, you are required to produce for discovery and inspection at the offices of the undersigned within twenty (20) days of service of this demand the following:

1. All primary insurance agreements and policies of insurance in effect at the time of the occurrence complained of under which any person carrying on an insurance business may be liable to satisfy part or all of a judgment which may be entered in this action or to indemnify or reimburse for payments made to satisfy the judgment;

2. All excess and umbrella insurance agreements and policies of insurance in effect at the time of the occurrence complained of under which any person carrying on an insurance business may be liable to satisfy part or all of a judgment which may be entered in this action or to indemnify or reimburse for payments made to satisfy the judgment;

PLEASE TAKE FURTHER NOTICE that any insurance document and policy produced in response to this demand shall be the complete document and policy including but not limited to

declaration sheets, riders, limitations, endorsements, amendments, cancellations, face sheets and/or binders, etc.

YOU ARE FURTHER REQUIRED to state the number of claims brought against you during the applicable policy period, the amount sought in each such claim, and the amount already paid, if any; Folgate v. Brookhaven Memorial Hospital, 381 N.Y.S.2d 384.

PLEASE TAKE FURTHER NOTICE that, if it is claimed that no liability insurance of any kind, type or description was in effect at the time of the occurrence complained of, then demand is hereby made that the above-named PARTY set forth, by AFFIDAVIT, said claim.

PLEASE TAKE FURTHER NOTICE that, you are required to timely supplement your responses to the foregoing demands with any additional or further information which becomes known to you or your attorneys during this action.

PLEASE TAKE FURTHER NOTICE that, in the event you fail to comply with the foregoing demands, appropriate motions will be made to compel disclosure or preclude you from offering in evidence at trial any matter which is not disclosed by you in response to this demand, in addition to other remedies available to this party.

Dated: New York, New York
October 19, 2010

Yours, etc.


FAUST GOETZ SCHENKER & BLEE
By: Marisa Goetz (MG 6582)
Attorneys for Defendants
NESCO BUS & TRUCK SALES, INC.,
NESCO BUS MAINTENANCE, INC., and
NESTOR ZARAGOZA
Two Rector Street, 20th Floor
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(212) 363-6900
Our File No.: 10915-UM

TO:

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Defendants.

**DEMAND FOR
STATEMENTS**

**Index No.:
CV-10-1578(DLI)(SMG)**

TO: CO-DEFENDANTS

PLEASE TAKE NOTICE, that the undersigned demands that you serve upon him at the address set forth below a copy of the statement of any party, agent, servant and/or employee of any party represented by the undersigned whether signed or unsigned or the transcript of any electronically recorded statement in accordance with the Federal Rules of Civil Procedure, within ten (10) days from the date of service of this demand.

PLEASE TAKE FURTHER NOTICE, that if said party is a corporation, the undersigned demands that you serve upon him a copy of a written statement, whether signed or unsigned, or the transcript of any electronically recorded statement of any officer, director, agent, servant or employee in accordance with the Federal Rules of Civil Procedure.

PLEASE TAKE FURTHER NOTICE, that in the event of failure or refusal to comply with this demand, the defendant(s) shall seek preclusion of such evidence at the time of trial of this action.

Dated: New York, New York
October 19, 2010

Yours, etc.



FAUST GOETZ SCHENKER & BLEE

By: Marisa Goetz (MG 6582)

Attorneys for Defendants

NESCO BUS & TRUCK SALES, INC.,

NESCO BUS MAINTENANCE, INC., and

NESTOR ZARAGOZA

Two Rector Street, 20th Floor

New York, New York 10006

(212) 363-6900

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TO:

Joseph E. Czerniawski

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Richard Solano, Jr. (*pro se*)
25 Doran Drive
Hopewell Junction, NY 12533


Elizabeth Santos

Sworn to before me this
19th day of October, 2010.


Notary Public

MARISA GOETZ
NOTARY PUBLIC STATE OF NY
NO. 02G06121680
QUALIFIED IN NY COUNTY
COMMISSION EXPIRES 01/24/13

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Defendants.

COMBINED DISCOVERY DEMANDS

FAUST GOETZ SCHENKER & BLEE

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